



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7**

11201 Renner Boulevard
Lenexa, Kansas 66219

SEP 21 2016

CERTIFIED MAIL

RETRUN RECEIPT REQUESTED

Article Number: 7014 1200 0000 6126 3854

Mr. Doug Stracke
Clow Valve Company
902 South 2nd Street
Oskaloosa, Iowa 52577

RE: RCRA Post-Closure Financial Assurance for
Clow Valve Division of McWane, Incorporated
Oskaloosa, Iowa 52577
EPA ID No. IAD981711807

Dear Mr. Stracke:

The U.S. Environmental Protection Agency has completed our review of Clow's financial assurance submittal dated March 30, 2016, for RCRA post-closure cost for the referenced facility. The EPA's review shows the following:

Post-Closure Cost Estimate/Annual Adjustment for Inflation

It does not appear that Clow's post-closure cost estimate was updated in current dollars or adjusted for inflation from the previous year. The 2015 post-closure cost estimate, \$919,011, is the same amount used in this year's financial assurance submittal. Using the criteria specified in 40 CFR §256.144(2)(b), the EPA's proposed current post-closure cost estimate based on a 30 year post-closure care period adjusted for inflation is \$928,201 (current inflation factor of 1.01).

The EPA is requesting Clow to either recalculate the post-closure cost estimate in current dollars and submit the updated cost estimate to the EPA for our review and approval, or annually adjust for inflation the EPA-approved 2015 post-closure cost estimate.

Within 30 calendar days of receiving this letter, please mail your response and revised financial assurance documents to: Ms. Patricia Murrow, AWMD/WRAP, U.S. Environmental Protection Agency, 11201 Renner Boulevard, Lenexa, Kansas 66219.

If you want to make a confidentiality claim covering part or all of the information submitted, identify the material with words such as "trade secret," "proprietary," or "company confidential." The EPA will disclose this information only to the extent and by the means described in 40 CFR Part 2, Subpart B., provided that it qualifies as confidential business information.



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Thank you for your cooperation in satisfying the financial assurance requirements at the referenced facility. If you have any questions on this matter, please feel free to contact me at (913) 551-7627 or by email at murrow.patricia@epa.gov.

Sincerely,



Patricia Murrow
Project Manager
Waste Remediation and Permitting Branch
Air and Waste Management Division

cc: Amie Davidson, IDNR
Charles F. Nowlin, McWane, Incorporated